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Via ECF

February 7, 2022

Honorable Judge Gregory Woods & Honorable Magistrate Stewart D. Aaron

United States District Court

Southern District of New York

40 Foley Square, NY 10007

Re: Letter Motion For An Order To Compel Plaintiffs To Adhere To Court Rules, Local

Rules of Civil Procedure and Federal Rules of Civil Procedure.

Dear Judges Woods and Aaron,

Order On Motion

Defendant Villa moves this court for a ruling, or order on motion to compel Plaintiffs, Pro Se Kumaran and Brian August attorney for named entities, to strictly conform all legal pleadings, motions, and letters in accordance with the Federal Rules of Civil Procedure and all applicable Laws of the State of New York's Southern District, Local

Rules and Individual Rules of this Court.

Plaintiff Kumaran "Pro Se" violates these rules repeatedly, regardless of numerous admonishments, and continues to knowingly and willingly violate the processes and procedures set forth in law. It is the intent of this "Letter Motion For An Order To Compel Plaintiffs To Adhere To Court Rules, Local Rules of Civil Procedure and Federal Rules of Civil Procedure" to provide a record of objection and bring judicial notice to this repeated offense. Plaintiff's continually file documents incomplete, late, and often at midnight claiming technical or personal problems and always ask for extensions, stalling and

delaying in bad faith. Plaintiff does not demonstrate consideration for Defendant's in other cases advancing through the courts whenever asked for equivalent "understanding of circumstances", but instead moves to strike those requests.

Clarification Requested

Plaintiffs argue that limitations on legal memorandum's do not apply to Pro Se litigants. As a result, Plaintiffs Kumaran and counsel for named entities Brian August far exceed the 25-page requirements established by Judge Gregory H. Woods and Magistrate Judge Stewart D. Aaron's Individual Rules of Practice in Civil Cases.

Judge Gregory H. Woods "Individual Rules Of Practice In Civil Cases" Revised November 12, 2020, states: "Unless prior permission has been granted, memoranda of law in support of and in opposition to motions are limited to 25 pages, and reply memoranda are limited to 10 pages. Memoranda of 10 pages or more must contain a table of contents and a table of authorities.

Whereas Judge Gregory H. Woods "<u>Individual Rules Of Practice In Civil PRO SE Cases</u>" Revised November 14, 2019, has been interpreted by Plaintiff Kumaran as not having any limitations. Plaintiffs further argues that despite the many Memorandums of Law she has written that far exceed the limits imposed by "<u>Individual Rules Of Practice In Civil Cases</u>", Plaintiff has never been admonished or corrected by the court.

February 7, 2022

Respectfully submitted,

Julie Villa

Pro Se